

GREEN KAMINER MIN & ROCKMORE LLP

Manhattan

420 Lexington Ave., Ste 2821
New York, New York 10170
T.212.681.6400

Long Island

600 Old Country Rd., Ste. 410
Garden City, New York 11530
T. 516.858.2115

October 7, 2023

VIA ECF

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse, Courtroom 618
40 Foley Square
New York, NY 10007

Re: *Sophie Belinda Turner v. Joseph Adam Jonas*
Case No. 1:23-cv-08349-KPF

Dear Judge Failla:

The parties have been engaged in productive mediation from October 4-7, 2023. Due to the progress made at mediation, the parties believe that an amicable resolution on all issues between them is forthcoming. For that reason, the parties jointly request that the Court enter the proposed order staying this proceeding and vacating all deadlines and trial dates submitted herewith.

Counsel for both parties are available for a conference concerning the status of the proceeding, the mediation, or the proposed order enclosed herewith at the Court's convenience should Your Honor believe it productive and appropriate.

Respectfully submitted,

/s/ Kelly A. Powers

Stephen J. Cullen, *Pro Hac Vice*
Kelly A. Powers, *Pro Hac Vice*
Miles & Stockbridge P.C.
1201 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004
(202) 465-8375
(410) 773-9102 (fax)
scullen@milesstockbridge.com

Matthew T. Wagman

Matthew T. Wagman, Bar No. 794922
Miles & Stockbridge P.C.

/s/Michael Banuchis

Richard Min
Michael Banuchis
Green Kaminer Min & Rockmore LLP
420 Lexington Avenue, Ste. 2821
New York, New York 10170
(212) 681-6400
rmin@gkmrlaw.com
mbanuchis@gkmrlaw

Jeremy D. Morley
Law Office of Jeremy D. Morley
230 Park Avenue
Third Floor West
New York, New York 10169
(212) 372-415

100 Light Street
Baltimore, MD 21202
(410) 385-3859
mwagman@milesstockbridge.com

Attorneys for Petitioner

jmorley@international-divorce.com

Attorneys for Respondent

cc: All counsel of record (via ECF)